



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONAL ADMINISTRATOR
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

April 13, 2020

The Honorable Gary Peters
United States Senate
Washington, D.C. 20510

Dear Senator Peters:

Thank you for your March 9, 2020 correspondence regarding your constituent's concerns with lead emissions from Mueller Brass Co. (Mueller) in Port Huron, Michigan. The U.S. Environmental Protection Agency, in coordination with the Michigan Department of Environment, Great Lakes, and Energy (EGLE), continually review the compliance status of facility operations at Mueller Brass Co. and the facility's impact on ambient air quality. I trust the following information provided on compliance monitoring activities, ambient air quality compliance, and the Mueller facility's air permit will be helpful.

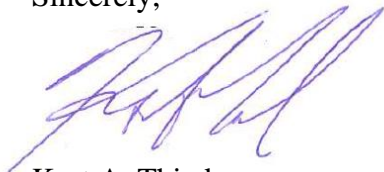
EPA and EGLE have conducted multiple onsite inspections of the Mueller facility. Based on information provided from these inspections, EGLE issued two Violation Notices (VNs) to Mueller in 2018. These VNs alleged various violations of permit conditions including a failure to maintain, operate, and monitor two baghouse systems. Mueller entered into an Administrative Consent Order (ACO) with EGLE on August 13, 2019, to resolve the violations. The consent order includes the following requirements: revise a Malfunction Abatement Plan, conduct performance testing at one baghouse (used to control particulate matter and lead), and minimize the discharge of uncontrolled dust or particulate matter emissions by minimizing door openings at the facility. Mueller conducted the required performance test and EGLE has reviewed the results and determined emissions from the unit do not exceed applicable limits. EGLE continues to work with Mueller to ensure the remaining ACO requirements are achieved.

EPA requires states to determine compliance with national ambient air quality standards (NAAQS) for criteria pollutants. EPA's criteria pollutant standards are set at a level that provide protection for the nation's public health and the environment. Lead is included in the list of criteria pollutants and has a NAAQS of 0.15 micrograms per cubic meter, based on the three-month average. EGLE's current air monitoring network includes two source-oriented monitors (i.e. located to determine the impact of a specific facility on ambient air quality) located near the Mueller facility. EPA reviewed data obtained from EGLE's monitors from January 2013 through September 2019 (the most recent data available). The monitors did not identify any violations of the NAAQS for lead during this six-year period.

As the federally delegated permitting authority in the State of Michigan, and in compliance with the federal Clean Air Act, EGLE has an established process for notifying the public of a permit action and proactively notifies interested persons. Anyone interested in receiving notifications or seeking to be added to the list, should contact EGLE's Janelle Trowhill at trowhillj1@michigan.gov. In addition, EGLE makes permits available to the public for review and provides information regarding any public hearings. The website for viewing state issued permits by Michigan EGLE is: <https://www.michigan.gov/egle/0,9429,7-135-3310-388619--,00.html>. EPA and EGLE will continue to monitor Mueller's compliance with all applicable state and federal regulations, as well as compliance with the NAAQS for lead at the two monitors located near the facility.

Again, thank you for your letter. If you have further questions, please contact me or your staff may contact Eileen Deamer, Region 5 Congressional Liaison, at (312) 886-3000.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kurt A. Thiede', with a stylized, cursive script.

Kurt A. Thiede
Regional Administrator